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Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: Docket No. 3692 – Verizon RI Proposed Alternative Form of Regulation Plan

Dear Ms. Massaro:

Due to the fact that the Commission is scheduled to address Verizon RI's proposed Successor Alternative Regulation Plan at open meeting tomorrow, Verizon submits this letter in lieu of an opposition to the Motion of the George Wiley Center to Compel Answers to Data Requests GWC 1-1 and 1-3 ("the Motion").

The Motion has no merit, and the Commission should deny it. Before filing its responses to GWC 1-1 and 1-3, Verizon RI offered to provide those responses to the Wiley Center pursuant to a protective agreement, on the same terms as have been accepted by the Division and the Attorney General in this proceeding. The Wiley Center refused, asserting that it "cannot agree to keep this [data] confidential." Obviously, the Wiley Center is not interested in using the data in this proceeding but seeks it instead *for the purpose of disclosing it to the public*. The Commission should not allow the Wiley Center to subvert the purpose of the proceeding to its own, unrelated ends.

Second, the data at issue – the number of Verizon RI residential customers whose service has been terminated in 2005 for failure to pay and the average amount owed by such customers at the time – is in no way relevant to any issue in this case. The Wiley Center claims it might be relevant to determining the appropriate level of subsidy of Lifeline service by Verizon RI, but the subject data does not distinguish between Lifeline and non-Lifeline customers and includes no data whatsoever showing *why* these customers did not pay their bills. Thus, this data cannot be made material without reliance on extreme speculation. In any event, the Wiley Center's refusal

to enter into a protective agreement which would allow it to obtain and use this data in this case makes a mockery of any implication that the data is important or relevant to the outcome of the proceeding.

Finally, the data is proprietary and competitively sensitive. Allowing Verizon RI's competitors this kind of data would give them a view into Verizon RI's operations and efficiency that Verizon RI is not allowed as to those competitors, and thus would place Verizon RI at a competitive disadvantage. The Wiley Center claims that "This kind of information is routinely provided by other utilities," but it fails to identify any such, and this information is assuredly *not* routinely made public by either Verizon RI or any other telephone company in Rhode Island.

For these reasons, Verizon RI requests that the Commission deny the Motion.

Sincerely,

Alexander W. Moore

cc: Service List (electronically only)